

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200
	)	
Third Further Notice of Proposed Rulemaking	)	
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	
Second Further Notice of Proposed Rulemaking	)	

**COMMENTS OF WORLDCOM, INC.**

On March 14, 2002, the Commission released its *NRO Third Order on Reconsideration*.<sup>1</sup> On its own motion, the Commission reversed a recent clarification of the local number portability (LNP) and thousands-block number pooling requirements for carriers in the 100 largest Metropolitan Statistical Areas (MSAs). At the same time, the Commission sought comment on whether it should reinstate the mandate of the reversed clarification by extending LNP requirements to all carriers in the largest 100 MSAs, regardless of whether they receive a specific request from a competitor to provide LNP. To promote both competition and numbering resource optimization, WorldCom recommends that the Commission extend LNP and pooling requirements to all carriers.

As the *NRO Third Order on Reconsideration* correctly recounts, the Commission initially determined that local exchange carriers and certain Commercial Mobile Radio Service (CMRS) providers operating in the 100 largest MSAs must provide LNP according to a phased deployment schedule.<sup>2</sup> On reconsideration and to focus LNP deployment in areas where competitive entry was concentrated, the Commission limited its LNP mandate to those switches within the 100 largest MSAs for which another carrier had made a specific request for LNP. That was almost five years ago. Now, the Commission should reinstate its original LNP mandate.

LNP should not be viewed as some optional feature of the public switched telephone network. It is in fact a step in the evolution of that network from one designed to accommodate the monopoly provision of local exchange service, to an interconnected network of competitive networks. By requiring deployment of LNP throughout the 100 largest MSAs, the Commission will take the next logical step in that evolution.

The fact that a carrier may not yet have received an LNP request for a particular switch should not be a barrier to LNP deployment. The implementation of LNP by wireless carriers, scheduled to occur later this year, is likely to create new demand for LNP, even in areas where wireline CLECs have not yet entered. Nor should the Commission ignore the possibility of entry by IP-based CLECs. Such competitors may be able to enter geographic areas that traditional CLECs have ignored. By mandating the widest possible implementation of LNP, the Commission will prepare the way for competition from wireless and other providers.

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<sup>1</sup> In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, *Third Order on Reconsideration*.

<sup>2</sup> *Id.*, ¶ 2.

For the same reason, the Commission should not exclude small companies that provide service only partially within the 100 largest MSAs. Again, the Commission's goal should be the widest possible deployment of LNP.

In addition to these competitive benefits, more widespread deployment of LNP will also yield greater number resource optimization benefits from number pooling. Of course, there is no need to pool if only one carrier is providing service in a particular rate area. But the deployment of LNP will allow pooling to begin more quickly if additional service providers enter that rate area.

Respectfully submitted,

WorldCom, Inc.

/s/  
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